

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

BRIAN C. MARQUIS,
Plaintiff,

v.

C. A. NO.: 04-30059-MAP

BERKSHIRE COMMUNITY COLLEGE, et al,
Defendants

JOINT DISCOVERY SCHEDULE

1. Pursuant to Fed.R.Civ.P. 26(f), a meeting was not held.
2. **Pre-Discovery Disclosures.** The parties have not exchanged the information requires by Fed.R.Civ.P. 26(a) (1);
3. **Discovery Plan.** The parties jointly propose to the Court the following discovery plan:

The following vehicles will recognize discovery:

- a) Production of Documents;
- b) Interrogatories;
- c) Depositions;
- d) Admissions;

All discovery commenced in time to be completed by 30 June 2005.

Maximum of 25 interrogatories (including subparts) by each party to any other party.
(responses due 30 days after service).

Maximum of ten (10) depositions by plaintiff and ten (10) by defendants.

Each deposition [other than members of the board of trustees] is hereby limited to maximum of four (4) hours per deponent, unless extended by agreement of parties.

- Either party with proper and timely notice allows videotaping of any deponent.

Reports from retained experts under Rule 26(a) (2) due: 31 March 2005
 from plaintiff by 31 March 2005
 from defendant(s) 31 March 2005

Supplementation under Rule 26(e) due at interval(s) of thirty days antecedent to the last submission, and required upon request of other party.

4. Other Items:

The parties request a conference with the court before entry of the scheduling order.
 The parties request a pretrial conference no later than 01 October 2005.
 Plaintiffs should be allowed until 15 April 2005 to join additional parties and until thirty (30) days thereafter to amend the pleadings.

All potentially depositive motions should be filled by 01 August 2005.

Settlement is unlikely, cannot be evaluated prior to 01 May 2005, and may be enhanced by use of the following alternative dispute resolution procedure:

- a) *Mediation;*
- b) *Summary Trail.*

Final list of witnesses and exhibits under Rule 26(a) (3) should be due:
 from Plaintiff by thirty (30) days following the Court's ruling on depositive motions;
 from defendant(s) by thirty (30) days following the Court's ruling on depositive motions.

Parties should have 30 days after service of final list of witnesses and exhibits to list objections under Rule 26(a) (3).

The case should be ready for trial by 30 October 2005, and the time is expected to take approximately one (1) week.

Dated: 10 November 2004

PLAINTIFF

By: 

BRIAN C. MARQUIS
Registered Paralegal
Plaintiff in propria persona
6 Billings Street
Lanesborough, MA 01237-9750
Tele No.: 413.4439675
Fax No.: 413.443.5513
Email: kmar918393@aol.com

DEFENDANTS

By: _____

Timothy M. Jones
Mass. Attorney General's Office
4th Floor
1350 Main Street
Springfield, MA 01103
413/784-1240 ext.105
Fax : 413/784-1244
Email: timothy.jones@ago.state.ma.us